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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KEVIN SMITH,	:
	:
Plaintiff,	: HONORABLE JEROME B. SIMANDLE
	: HONORABLE KAREN M. WILLIAMS
	:
v.	: Civil Action No. 18-5088 (JBS) (KMW)
	:
BURLINGTON COUNTY, et al.,	: NOTICE OF MOTION
	:
Defendants.	: Return Date: August 19, 2019
	:

To: CLERK OF THE COURT

Justin C. Bonus, Esq.
Justin C. Bonus Attorney at Law
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PLEASE TAKE NOTICE that on August 19, 2019, federal defendants TFO Shawn Gorlin, the United States Marshals Service, and the United States of America, by the undersigned attorneys, shall move under Federal Rule of Civil Procedure 26(c)(1)(A) before the Honorable Judge Karen M. Williams, United States Magistrate Judge, for entry of a Protective Order staying all discovery against the federal defendants until disposition of the pending motion to dismiss.

In support of this motion, federal defendants will rely upon: (1) the Amended Complaint, (2) the motion papers; (3) a brief, and (4) the certification of AUSA Anne B. Taylor. A proposed form of order is also submitted with this notice.

CRAIG CARPENITO
United States Attorney

s/ Anne B. Taylor

By: ANNE B. TAYLOR

Assistant United States Attorney

Date: July 26, 2019